

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

---

**In re: PHARMACEUTICAL INDUSTRY  
AVERAGE WHOLESALE PRICE LITIGATION**

---

)  
) **MDL No. 1456**  
) **Master File No. 01- 12257-PBS**  
) **Subcategory Case No. 06-11337**  
) **Hon. Patti B. Saris**

**THIS DOCUMENT RELATES TO:**

*United States of America ex rel. Ven-A-Care of the  
Florida Keys, Inc., et al. v. Dey, Inc., et al.,*  
Civil Action No. 05-11084-PBS

---

)  
) **Magistrate Judge**  
) **Marianne B. Bowler**  
)  
)  
)  
)

**DECLARATION OF SARAH L. REID IN FURTHER SUPPORT OF DEFENDANTS  
DEY, INC., DEY, L.P., AND DEY L.P., INC.'S MOTION TO DISMISS THE  
RELATOR'S COMPLAINTS FOR LACK OF SUBJECT MATTER JURISDICTION**

**SARAH L. REID** declares, pursuant to 28 U.S.C. § 1746, that:

1. I am a member of the law firm of Kelley Drye & Warren LLP, counsel to Dey L.P., Dey, Inc., and Dey L.P., Inc. (collectively "Dey"). I am admitted to practice law in the State of New York and have been admitted *pro hac vice* in this action.
2. I make this Declaration in further support of Dey's Motion to Dismiss Relator's Complaints for Lack of Subject Matter Jurisdiction.
3. The basis for my knowledge is my review of the files maintained by Kelley Drye & Warren LLP as part of its representation of Dey, including the documents attached hereto, and my own personal knowledge of the facts and circumstances set forth herein.
4. Attached hereto as Exhibit 47 are true and correct copies of excerpts of the transcript of the deposition of T. Mark Jones, taken on December 8, 2008.
5. Attached hereto as Exhibit 48 are true and correct copies of excerpts of the transcript of the deposition of Dr. John Lockwood, taken on July 28, 2009.

6. Attached hereto as Exhibit 49 are true and correct copies of excerpts of the transcript of the deposition of Luis Cobo, taken on March 3, 2003.

7. Attached hereto as Exhibit 50 are true and correct copies of excerpts of the transcript of the deposition of T. Mark Jones, taken on December 9, 2008.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on November 23, 2009.

/s/Sarah L. Reid

Sarah L. Reid

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing was delivered to all counsel of record by electronic service pursuant to Paragraph 11 of Case Management Order No. 2, by sending on November 23, 2009, a copy to LexisNexis File & Serve for posting and notification to all parties.

/s/Sarah L. Reid

Sarah L. Reid